

**TIFFANY & BOSCO, P.A**

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Attorney for U.S. Bank, N.A. as Trustee for the SACO I Trust 2006-3, Mortgage-backed Certificates, Series 2006-3

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

IN RE:

Sheryl Sims,

Debtor.

No. 18-13699-leb

Chapter 13

**OBJECTION TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN**

U.S. Bank, N.A. as Trustee for the SACO I Trust 2006-3, Mortgage-backed Certificates, Series 2006-3, Secured Creditor in the above-entitled Bankruptcy proceeding, hereby submits the following objection to that certain Chapter 13 Plan proposed by the Debtor:

Secured Creditor holds the first Deed of Trust on the subject property generally described as 2653 Smooth Blend Place, Henderson, NV 89052. As of June 24, 2018, the amount in default was approximately \$61,157.39, pursuant to the forthcoming proof of claim to be filed by U.S. Bank, N.A. as Trustee for the SACO I Trust 2006-3, Mortgage-backed Certificates, Series 2006-3. The Debtor's Chapter 13 Plan lists the arrearage owing to Secured Creditor as \$59,080.00. Secured creditor requests that the arrearages as will be set forth in the Proof of Claim be filed through the Plan.

1 Any Chapter 13 Plan proposed by the Debtor must provide for and eliminate the Objections specified  
2 above in order to be feasible and to provide adequate protection to this Secured Creditor.

3 It is respectfully requested that Confirmation of the Chapter 13 Plan as proposed by the Debtor be  
4 denied.

5 WHEREFORE, Secured Creditor prays as follows:

- 6
- 7 1. That confirmation of the proposed Chapter 13 Plan be denied;
  - 8 2. For attorney's fees and costs incurred herein;
  - 9 3. For such other and further relief as this Court deems just and proper.

10 DATED this 8th day of August, 2018.

11  
12 **TIFFANY & BOSCO, P.A.**

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14 By /s/ Jason C. Kolbe  
15 **Jason C. Kolbe, Esq.**  
16 Attorney for Secured Creditor  
17 10100 W. Charleston Boulevard, Suite 220  
18 Las Vegas, NV 89135  
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U.S. Bank, N.A. as Trustee for the SACO I Trust 2006-3, Mortgage-backed Certificates, Series 2006-3  
18-72919

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

IN RE:

Sheryl Sims

Debtor,

No. 18-13699-leb

Chapter 13

Date: July 16, 2018  
Time: 1:30 p.m.

**CERTIFICATE OF MAILING OF OBJECTION TO  
CONFIRMATION OF PROPOSED CHAPTER 13 PLAN**

1. On August 8, 2018 I served the following documents:

OBJECTION TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN

2. I caused to be served the above-named document by the following means to the persons as listed below:

**X a. ECF System**

Carrie E. Hurtik  
[churtik@hurtiklaw.com](mailto:churtik@hurtiklaw.com)  
Attorney for Debtor

Kathleen A Leavitt  
courtsecf3@las13.com  
Trustee

**X b. United States mail, postage fully prepaid:**

Sheryl Sims  
2653 Smooth Blend Place  
Henderson, NV 89052  
Debtor

☐ **c. Personal Service**

I personally delivered the document(s) to the persons at these addresses:

☐ 1. For a party represented by an attorney, delivery was made by handing the document(s) to the attorney's office with a clerk or other person in charge, or if no one is charge by leaving the document(s) in a conspicuous place in the office.

N/A

☐ 2. For a party, delivery was made by handing the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

N/A

☐ **d. By direct mail (as opposed to through the ECF System)**

Based upon the written assignment of the parties to accept service by email or a court order. I caused the document(s) to be sent to the persons at the mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ **e. By fax transmission**

Based upon the written assignment of the parties to accept service by fax transmission or a court order. I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

☐ **f. By messenger**

1 I served the document(s) by placing them in an envelope or package addressed to the persons at  
2 the addresses listed below and providing them to a messenger for service.

3 **I declare under penalty of perjury the foregoing is true and correct.**

4 DATED this 8th day of August, 2018.

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6 By: /s/ Brad Anderson  
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